



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

WILLS — REVOCATION — DUPLICATE WILLS — LOSS OF ONE OF TWO DUPLICATES IN POSSESSION OF TESTATOR. — The testator executed his will in duplicate, and took possession of both duplicates. Upon his death, one was found in his safe-deposit box. The other could not be found. *Held*, that the will be admitted to probate. *Matter of Shields*, 190 N. Y. Supp. 562 (Surr. Ct.).

Each duplicate is the last will of the testator. See *Odenwaelder v. Schorr*, 8 Mo. App. 458, 464. The will may be revoked by act to one of the duplicates, with an intent to revoke. Such intent has been inferred from the cancellation of one duplicate, though the testator had both in his possession. *Pemberton v. Pemberton*, 13 Ves. 302. See 1 JARMAN, WILLS, 6 Am. ed., *123. But see *Roberts v. Round*, 3 Hagg. Ecc. 548. The difficulty in the principal case is to determine whether the missing duplicate was destroyed with such intent. If the testator retain but one duplicate, the fact that it cannot be found at his death raises a presumption that he destroyed it *animo revocandi*. *Rickards v. Mumford*, 2 Phillim. 23; *Colvin v. Fraser*, 2 Hagg. Ecc. 266; *Matter of Schofield's Will*, 72 Misc. 281, 129 N. Y. Supp. 190. Cf. *Managle v. Parker*, 75 N. H. 139, 71 Atl. 637. Can a revocation be inferred when, as in the principal case, both duplicates have been retained, and one is missing? The disappearance of a will loses much of its significance when an equally valid duplicate remains intact in the testator's possession. Little is to be gained by saying that a presumption of revocation arises from the fact that one will is missing, and is rebutted by the fact that the other has been preserved. It is better simply to draw an inference from all the facts; and in the principal case it may fairly be inferred that there was no revocation.

BOOK REVIEWS

WAR GOVERNMENT OF THE BRITISH DOMINIONS. By Arthur Berriedale Keith. Being part of the Economic and Social History of the World War, British Series, published by the Carnegie Endowment for International Peace, Division of Economics and History. Oxford: Clarendon Press. 1921. pp. xvi, 354, (5).

The British Empire has always belied its name. "This realm of England is an Empire," declared a statute of Henry VIII with the Cæsarian flourish he loved; and if there was incongruity in adopting the term for an assertion of exclusive jurisdiction over his exiguous territory, there is no less in employing it to describe the congeries of free communities which form the Britannic Commonwealth to-day. The subjects of his successors made it most nearly applicable to reality when they had, as Seeley said, "conquered and peopled half the world in a fit of absence of mind"; but they carried with them their share of a tradition of free government that raised problems the solutions of which no Roman precedents could supply. The last hundred years witnessed the progress of Canada, Australia, New Zealand, and South Africa, by similar stages, to internal self-government, and the period since the outbreak of world war has seen them accorded a status of partnership with the United Kingdom and international recognition.

It is with the activities of their governments during the latter period, and the relations of those governments with that of the United Kingdom, that Mr. Keith's book deals. It gives a well-proportioned and lucid statement of complicated facts; his description of political operations and results is almost always exact, though a few *nuances* would doubtless have been different had it been possible for him to be closely in touch with local conditions so widely dispersed; but there are more serious objections to some of his statements and